



April 4, 2025

Chairman Brendan Carr  
Federal Communications Commission  
45 L Street, N.E.  
Washington, DC 20554

Dear Chairman Carr,

On behalf of KTKA, and The Northeast Kansas CW, I write as part of the *In re: Delete, Delete, Delete* proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local community.

KTKA, originally launched as KLDH on June 20, 1983, becoming Topeka's first full-time ABC affiliate, providing the area with complete network coverage. The Northeast Kansas CW launched in 2006. On this platform we air 22.5 hours of local news every week. The news aired on these stations help keep the entire community up to date on current events, breaking news, severe weather and in-depth reporting.

KTKA has demonstrated a strong commitment to supporting local charitable organizations, including the Family Service and Guidance Center and TARC, through substantial fund-raising exceeding \$250,000. The Family Service and Guidance Center, dedicated to offering mental health services to children and families, has utilized the funds to expand counseling programs and community outreach initiatives. Similarly, TARC, which supports individuals with developmental and intellectual disabilities, has benefited by improving its educational resources and support services. Our charitable efforts have played an important role in fostering community well-being and supporting vulnerable populations in the region.

Television viewers in communities across the United States depend on their local TV stations to provide them with important information that directly impacts their lives, including news, weather, sports, and often lifesaving emergency information. Local TV stations are often the first place people turn to for news and information and, increasingly, the only remaining source of local journalism.

As local newspapers and radio stations go out of business or are forced to severely limit their operations or adopt a national format, the role local broadcasters play in disseminating accurate information is more important than ever. Still, local stations like these are suffering because of

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archaic FCC rules and regulations that have no connection to current marketplace realities. Without regulatory relief, KTKA and The Northeast Kansas CW will be unable to continue making the kinds of investments necessary to produce the high-quality news and information programming upon which our viewers rely daily.

The current ownership restrictions originally were intended to promote competition and diversity in broadcasting and were conceived at a time when streaming technology didn't even exist and the few large platforms were the legacy Big 3 broadcast networks. However, the industry has changed dramatically. Today, streaming platforms, digital content providers, and big tech giants wield vast influence reaching households across multiple devices without any of the restrictions placed on local broadcasters. This puts us at a severe disadvantage when compared to big tech, who are not bound by the same regulations and continue to dominate the advertising and media distribution landscape.

Eliminating or modernizing these regulations would:

- Enable local broadcasters to expand and enhance their local news and community programming and continue investing in new technology, innovation, and viewer services.
- Allow local broadcasters to better compete with digital giants that are not subject to the current restrictions on reach.
- Improve efficiency in operations, ensuring financial stability and more effective long-term planning.

The reality of today's media environment demands a reconsideration of legacy rules that no longer reflect the urgent situation hastened by the industry's competitive dynamics. We urge the FCC to take swift, decisive action in eliminating the restrictions on media ownership to ensure a level playing field that benefits both local broadcasters and the communities we serve.

Thank you for your attention to this important matter.

Sincerely,

A handwritten signature in black ink that reads 'Doug Overla'. The signature is fluid and cursive, with a large, prominent 'O' in 'Overla'.

Doug Overla

Vaughan Media, LLC



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